

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO.: 3:22-CV-223-RJC-DCK**

**U.S. SECURITIES AND  
EXCHANGE COMMISSION,**

**Plaintiff**

v.

**WYNN A.D. CHARLEBOIS and  
WC PRIVATE LLC,**

**Defendants**

**MOTION FOR EXTENSION OF TIME TO PROVIDE ACCOUNTING**

NOW COME defendants Wynn A.D. Charlebois and WC Private LLC, and move for an extension of time to file the accounting ordered by this Court, up to and including June 8, 2022. In support of this motion, defendants show the Court:

1. By order of this Court, defendants were to provide an accounting to this Court and the Commission no later than June 3, 2022 in order to allow defendants to obtain representation to help prepare their responses.
2. The undersigned counsel was retained on June 2, 2022 and met with Mr. Charlebois for the first time the following day.
3. Mr. Charlebois and the undersigned are working to provide the accounting but require additional time.

4. The undersigned has conferred with counsel for the Commission who does not object to an extension until Wednesday, June 8, 2022.

WHEREFORE, defendants move for an extension of time to provide the accounting until June 8, 2022.

Dated: June 6, 2022

Respectfully submitted,

/s/ Noell P. Tin

TIN FULTON WALKER & OWEN PLLC  
301 East Park Avenue  
Charlotte, N.C. 28203  
T: (704) 338-1220  
F: (704) 338-1312  
[ntin@tinfulton.com](mailto:ntin@tinfulton.com)  
*Counsel for defendants Wynn Charlebois and  
WC Private LLC*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that he has served the foregoing MOTION FOR EXTENSION OF TIME TO PROVIDE ACCOUNTING with the Clerk of Court using the CM/ECF system, which will send notification of such filing to opposing counsel:

Robert F. Schroeder  
Senior Trial Counsel  
[schroederr@sec.gov](mailto:schroederr@sec.gov)

M. Graham Loomis  
Regional Trial Counsel  
[loomism@sec.gov](mailto:loomism@sec.gov)

Dated: June 6, 2022

/s/ Noell P. Tin